SUBMISSION TO THE CONSULTATION PAPER-TRANSMISSION PLANNING AND INVESTMENT REVIEW

stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to provide feedback on issues raised. This template is not exhaustive and therefore stakeholders are encouraged to comment on any additional issues or suggest additional solutions. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

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| **ORGANISATION:** | Click or tap here to enter text. |
| **CONTACT NAME:** | Click or tap here to enter text. |
| **EMAIL:** | Click or tap here to enter text. |
| **PHONE:** | Click or tap here to enter text. |
| **DATE** | Click or tap here to enter text. |

project DETAILS

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| **NAME OF RULE CHANGE:** | Transmission Planning and Investment Review |
| **PROJECT CODE:** | EPR0087 |
| **PROPONENT:** | AEMC |
| **SUBMISSION DUE DATE:** | 30 September 2021 |

**Introduction**- ASsessment criteria

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| 1. Do you agree with the Commission’s proposed assessment framework for this Review?
 | Click or tap here to enter text. |
| 1. Are there any additional criteria the Commission should consider as a part of its assessment framework?
 | Click or tap here to enter text. |

**CHAPTER 3** – Issues in the regulatory framework and processes for planning of major transmission projects

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| **Implications of increased uncertainty for the ex-ante incentive-based regulatory framework** |
| 1. Do you agree with that the identified factors contribute to an increase to the uncertainty surrounding major transmission projects, relative to BAU projects? Are there other factors that should be taken into account?
 | Click or tap here to enter text. |
| 1. Do you consider that the current ex-ante incentive-based approach to regulation is appropriate for major transmission projects? Why? Are there opportunities to drive more efficient expenditure and operational outcomes?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |
| **Economic assessment of major transmission projects** |
| 1. Are there opportunities to streamline the economic assessments of ISP and non-ISP projects without compromising their rigour? If so, how could the framework be streamlined?
 | Click or tap here to enter text. |
| 1. Do you agree that the RIT-T has a clearer value-add in relation to non-ISP projects? If not, why?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |
| **Benefits included in planning processes** |
| 1. Are the benefits included in current planning processes sufficiently broad to capture the drivers of major transmission investment? Does the scale and pace of the NEM's energy transition necessitate inclusion of other classes of market benefits or wider economic benefits? If so, what kind of other classes of market benefits or wider economic benefits should be included?
 | Click or tap here to enter text. |
| 1. Are major transmission projects failing to satisfy economic assessments because certain benefits (market or non-market) are not permitted to be quantified?
 | Click or tap here to enter text. |
| 1. Are changes warranted to the manner in which carbon emissions inform transmission planning and regulatory processes?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |
| **Guidance on hard to monetise benefits** |
| 1. What classes of market benefits are hard to monetise? Is there a way that these benefits could be made easier to quantify?
 | Click or tap here to enter text. |
| 1. Would guidance on hard to monetise benefits improve the timeliness at which projects proceed through the regulatory process?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |
| **Market versus consumer benefits test** |
| 1. Do you consider that there are certain changes that have occurred in the energy sector that warrant reconsidering the merits of a market versus consumer benefits test? If yes, what are these changes and why do they require revisiting this issue?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |
| **Treatment of non-network options** |
| 1. Do you agree that there are barriers for non-network options in economic assessments? If so, do you agree with the barriers identified? Are there any further barriers? How should these barriers be addressed?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |

**CHAPTER 4** – Issues in the regulatory framework and processes for transmission investment, financing and delivery

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| **Balancing TNSP’s exclusive right to build and own transmission projects** |
| 1. Are there features of financing infrastructure projects used in other sectors that should be considered in the context of the efficient and timely delivery of major transmission projects?
 | Click or tap here to enter text. |
| 1. Should the delivery of transmission projects be made contestable? If not, why?
 | Click or tap here to enter text. |
| 1. What options, other than changes to the right of TNSPs to provide regulated transmission assets, could be considered to ensure timely investment and delivery of major transmission projects?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |
| **Treatment of of 'early works'** |
| 1. Do stakeholders seek further clarity on the meaning of preparatory activities and early works?
 | Click or tap here to enter text. |
| 1. Should the Commission consider how the costs of early works can be recovered?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |
| **Processes for jurisdictional environmental and planning approval** |
| 1. Would additional clarity on cost recovery arrangements for preparatory activities or early work improve a TNSP’s ability to meet jurisdictional requirements in a timely manner?
 | Click or tap here to enter text. |
| 1. Do jurisdictional planning and environmental requirement intersect with the national transmission planning and investment frameworks in ways that are not discussed above and may require further consideration?
 | Click or tap here to enter text. |
| 1. Do you agree that the Review should take forward this issue as a priority issue? If not, why?
 | Click or tap here to enter text. |

**OTHER COMMENTS**

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| 1. Please provide any further comment relating to issues discussed in the chapters 1-4 of the consultation paper.
 | Click or tap here to enter text. |
| 1. Please discuss any further issues the Commission should take forward in this review in relation to topics covered in chapters 1-4 of the consultation paper.
 | Click or tap here to enter text. |

**Template for Material change in network infrastructure project costs rule change request**

**CHAPTER 5** – Material change in network infrastructure project costs rule change request

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| **Who should decide whether whether the RIT-T must be reapplied?** |
| 1. Should this decision remain the responsibility of the proponent or should it be a matter for the AER? Why?
 | Click or tap here to enter text. |
| 1. If the decision remains with the proponent, should the AER have the right to test that opinion?
 | Click or tap here to enter text. |
| **Cost thresholds** |
| 1. Should the NER include a requirement to reapply the RIT, or update analysis, when costs increase above specified thresholds? If so, do you have a view as to what those thresholds should be?
 | Click or tap here to enter text. |
| 1. Do you consider this requirement should apply to all RIT projects or only those above a particular cost threshold/s? If so, do you have a view as to what the threshold/s should be?
 | Click or tap here to enter text. |
| 1. Do you have any views regarding the suggested alternative “decision rule” approach?
 | Click or tap here to enter text. |
| 1. Should updated project cost data be provided to AEMO to help improve the accuracy of the ISP?
 | Click or tap here to enter text. |
| 1. Do you have any other suggestions regarding alternative ways to manage cost increases?
 | Click or tap here to enter text. |
| **Requirements when reapplying the RIT** |
| 1. Should the requirement to reapply the RIT be more targeted?
 | Click or tap here to enter text. |
| 1. Should any additional analysis and modelling that is required to be undertaken be published and subject to public consultation?
 | Click or tap here to enter text. |
| **Trigger to reapply the RIT** |
| 1. Do you have any views as to how the requirement to reapply the RIT should be given effect, including for contingent and non-contingent projects?
 | Click or tap here to enter text. |
| 1. Should there be a cut-off point (e.g. once the AER approves the CPA, or once construction commences) beyond which any requirement to update analysis cannot be triggered? If so, what would be an appropriate cut-off point?
 | Click or tap here to enter text. |
| 1. Should there be a limit on how many times RIT analysis must be updated?
 | Click or tap here to enter text. |
| **Should RIT cost estimates be more rigorous?** |
| 1. Do you consider that the current level of rigour used for RIT cost estimates is suitable? If not, what level of rigour is appropriate? In particular, would it be appropriate to require an AACE 2 estimate (i.e. a detailed feasibility study) for each credible option?
 | Click or tap here to enter text. |
| 1. If more detailed cost estimates are required at the RIT stage, should this apply to all RIT projects, or only to larger projects? If so, which projects should be subject to this requirement?
 | Click or tap here to enter text. |
| 1. Do you have any other suggestions to address the issues raised in the rule change request?
 | Click or tap here to enter text. |

**OTHER COMMENTS**

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| 1. Please provide any further comments on this chapter.
 | Click or tap here to enter text. |